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11 Attorneys for Defendant
12 HITACHI ASIA, LTD.

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15 SAN FRANCISCO DIVISION

16 IN RE: CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION

CASE NO.: 3:07-cv-05944-SC

MDL NO.: 1917

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19 This Document Relates To:

20 *All Actions.*
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DECLARATION OF WEI LING QUEK IN
SUPPORT OF HITACHI ASIA, LTD.'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT ON DUE PROCESS
GROUNDS

1 I, Wei Ling Quek hereby declare:

2 1. I am over the age of eighteen, and am not a party to this action. I have personal
3 knowledge of the facts and matters stated herein and, if called, could and would testify competently
4 to them.

5 2. I am currently employed by Hitachi Asia, Ltd. ("HAS") as the General Manager of
6 the Legal and Compliance Group. I am authorized to make this declaration on behalf of Hitachi
7 Asia, Ltd. I am informed and believe that the matters stated in this declaration are true.

8 3. HAS is a Singaporean company with its principal place of business at 7 Tampines
9 Grande, #08-01 Hitachi Square, Singapore 528736.

10 4. Prior to June 2002, HAS sold cathode ray tubes ("CRTs"). HAS never manufactured
11 CRTs. HAS did not sell CRTs to CRT Product manufacturing facilities located in the United States.
12 HAS never sold or manufactured CRT Products in the United States. HAS did not sell CRTs to
13 consumers because CRTs are not a standalone product.

14 5. Between March 1, 1995 and November 25, 2007, the Relevant Period alleged by the
15 plaintiffs in this case, HAS had no sales of CRTs or CRT Products to customers located in Arizona,
16 California, Florida, Illinois, Massachusetts, Michigan, Minnesota, Mississippi, Nebraska, Nevada,
17 New York, New Mexico, North Carolina, or Wisconsin (collectively, the "Relevant States").

18 6. HAS has no offices or other facilities in the Relevant States.

19 7. HAS does not own property in the Relevant States. HAS has never acquired or leased
20 property in the Relevant States.

21 8. HAS has never filed or been required to file taxes in the Relevant States.

22 9. HAS has never held any formal meetings of its directors or shareholders in the
23 Relevant States.

24 I declare under penalty of perjury that the foregoing is true and correct. Executed on the 6th
25 day of November, 2014 in Singapore.

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